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STATE OF CALIFORNIA

WATER RESOURCES CONTROL BOARD

DIVISION OF DRINKING WATER

TO:

Fountain Trailer Park Water System, System No. 1500461

Attn:

Barbara Gonzales, Owner Fountain Trailer Park 4696 Park Mirasol Calabasas, CA 91302

CERTIFIED MAIL

CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 64426.1(b)(2) - WATER SYSTEM NO. 1500461

December 2015

CITATION NO. 03-19-16C-014

Issued on March 22, 2016

STATEMENT OF FACTS

Fountain Trailer Park Water System (hereinafter Water System) is classified as a Community water system and serves a population of approximately 68 persons through 32 service connections. The Water System has one active source of supply, Well 01 (PS Code: 1500461-001) and six (6) 119-gallon bladder tanks. No treatment is currently provided to the well water. The Water System operates under the authority of a domestic water supply permit No. 461, issued on May 3, 1971, by the Kern County Environmental Health Services Department. Effective July 1, 2014, regulatory jurisdiction of the Water System was transferred to the State Water Resources Control Board (hereinafter "State Board"), Division of Drinking Water.

Water supplied by Well 01 is in ongoing violation of the arsenic MCL of 10 ug/L, with arsenic level in the range of 80 to 85 ug/L. As a long-term solution to the arsenic problem, the Water System is part of a Proposition 84 funding project to consolidate with the neighboring North Edwards Water District. Due to litigation, the Proposition 84 construction funding project is currently on hold. As an interim solution to high arsenic in the well, the State Board is providing funding for bottled water for drinking and cooking, under the CAA funding program. Delivery of bottled water started on January 19, 2016.

Section 116650 of the California Health and Safety Code authorizes the issuance of a citation to a public water system for violation of the California Safe Drinking Water Act (Health and Safety Code, Division 104, Part 12, Chapter 4, commencing with Section 116270) (hereinafter "California SDWA"), or any regulation, standard, permit or order issued or adopted thereunder.

The State Board, acting by and through its Division of Drinking Water and the Deputy Director for the Division of Drinking Water, hereby issues a citation to Fountain Trailer Park Water System (mailing address: 4696 Park Mirasol, Calabasas, CA 91302) for violation of California Code of Regulations (CCR), Title 22, Section 64426.1 subsection (b)(2).

- The Water System collects one (1) routine distribution system bacteriological samples per month.
- One (1) routine bacteriological quality samples collected on December 16,
 2015, from the distribution system, tested positive for total coliform bacteria.

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- Three (3) repeat bacteriological quality samples collected on December 17,
 2015, from the distribution system, tested positive for total coliform bacteria.
- One (1) repeat bacteriological quality sample collected on December 17, 2015,
 from Well 01 (also counted towards the Ground Water Rule's trigger source
 sampling requirement), tested negative for total coliform bacteria.
- Fountain Trailer Park Water System failed the total coliform maximum contaminant level (MCL) for December 2015 [Section 64426.1(b)(2), Authorities].
- On December 17, 2015, Dollie Kostopolous, contract sampler and certified distribution operator for the Water System, informed the State Board, by telephone, of the routine total coliform positive sample that was collected on December 16, 2015.
- On December 21, 2015, Ms. Kostopolous reported to the State Board that the
 pipeline from the Water System's well to distribution system had broken and
 there was no water pressure in the distribution system.
- On December 21, 2015, the State Board issued a Do Not Drink Notice to the
 Water System. After completion of the repairs to the broken water pipe, some
 pipes in the distribution system froze, causing a delay in restoration of pressure
 in the distribution system. Bacteriological sampling was further delayed due to
 bad weather conditions (gusty winds, freezing temperatures, rain, etc.).
- After restoring the water pressure, the distribution system was flushed, and five (5) bacteriological quality samples were collected on January 7, 2016, from the

distribution system, and all five (5) samples tested negative for total coliform bacteria.

- On January 8, 2016, the State Board cancelled the Do Not Drink Notice and issued a cancellation notice to the Water System.
- None of the bacteriological quality samples collected in December 2015 or January 2016 tested positive for E. coli bacteria.
- On February 3, 2016, a public notice and Certification of Completion of Public Notification were emailed to the Water System for the December 2015 total coliform MCL failure.
- On February 15, 2016, the State Board received signed and dated copies of the
 Certification of Completion of Public Notification and the public notice.
 According to these documents, public notification was completed on February
 7, 2016.
- On February 3, 2016, an investigation report was emailed to the Water System,
 for the December 2015 total coliform MCL failure.
- On February 15, 2016, the State Board received a completed copy of the investigation report. The investigation report was completed by Ms. Kostopolous. According to the investigation report, the pipe from Well 01 froze and cracked, and when it thawed, Ms. Kostopolous (sampler) was not aware of the cracked pipe, and collected a routine monthly sample as usual. Bacteriological contamination may have been caused by this. The broken pipeline from Well 01 was later repaired, as discussed previously in this citation.

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- Five (5) routine bacteriological samples collected on January 13, 2016, tested negative for total coliform bacteria.
- It was brought to the attention of the State Board that due to the configuration of the Water System, and the tendency of distribution system pipes to freeze in winter, it is often difficult to provide emergency chlorination and/or flushing. Therefore, the Water System will be directed to develop and submit an Emergency Chlorination Plan to the State Board for approval.
- Results of all (source and distribution) bacteriological samples collected from January 2015 to January 2016 are summarized in Attachment A.

AUTHORITIES

Section 116577 of the CHSC, states in relevant part:

- "(a) Each public water system shall reimburse the State Board for the actual costs incurred by the State Board for any of the following enforcement activities related to that water system:
 - (1) Preparing, issuing, and monitoring compliance with, an order or citation.
 - (2) Preparing, and issuing public notification
- (b) The State Board shall submit an invoice for these enforcement costs to the public water system that requires payment prior to September 1 of the fiscal year following the fiscal year in which the costs were incurred. The invoice shall indicate the total hours expended, the reasons for the expenditure, and the hourly cost rate of the State Board. The costs set forth in the invoice shall not exceed the total actual costs to the State Board of the enforcement activities specified in this section."...

Section 116650 of the CHSC, states in relevant part:

- "(a) If the State Board determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the State Board may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).
- (e) The State Board may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation."

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Section 116655 of the CHSC, states in relevant part:

"(a) Whenever the State Board determines that any person has violated or is violating this chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter, the director may issue an order doing any of the following:

- (1) Directing compliance forthwith.
- (2) Directing compliance in accordance with a time schedule set by the State Board.
- (3) Directing that appropriate preventive action be taken in the case of a threatened violation.
- (b) An order issued pursuant to this section may include, but shall not be limited to, any or all of the following requirements:
 - (1) That the existing plant, works, or system be repaired, altered, or added to.
 - (2) That purification or treatment works be installed.
 - (3) That the source of the water supply be changed.
 - (4) That no additional service connection be made to the system.
- (5) That the water supply, the plant, or the system be monitored.
- (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the State Board."

California Code of Regulations (hereinafter, CCR), Title 22, Section 64423, Table 64423-A establishes the minimum routine sampling requirements, and states in relevant part:

Monthly Population Served	Service Connections	Minimum Number of Samples
25 to 1000	15 to 400	1 per month
1,001 to 2,500	401 to 890	2 per month
2,501 to 3,300	891 to 1,180	3 per month
3,301 to 4,100	1,181 to 1,460	4 per month
4,101 to 4,900	1,461 to 1,750	5 per month
4,901 to 5,800	1,751 to 2,100	6 per month
5,801 to 6,700	2,101 to 2,400	7 per month
6,701 to 7,600	2,401 to 2,700	2 per week
7,601 to 12,900	2,701 to 4,600	3 per week
12,901 to 17,200	4,601 to 6,100	4 per week
17,201 to 21,500	6,101 to 7,700	5 per week
21,501 to 25,000	7,701 to 8,900	6 per week
25,001 to 33,000	8,901 to 11,800	8 per week
33,001 to 41,000	11,801 to 14,600	10 per week
41,001 to 50,000	14,601 to 17,900	12 per week
50,001 to 59,000	17,901 to 21,100	15 per week

CCR, Title 22, Section 64426.1 establishes the total coliform maximum contaminant level and states in relevant part:

- "(a) Results of all samples collected in a calendar month pursuant to Sections 64423, 64424, and 64425 that are not invalidated by the State Board or the laboratory shall be included in determining compliance with the total coliform MCL. Special purpose samples such as those listed in 64421(b) and samples collected by the water supplier during special investigations shall not be used to determine compliance with the total coliform MCL.
- (b) A public water system is in violation of the total coliform MCL when any of the following occurs:
 - (1) For a public water system which collects at least 40 samples per month, more than 5.0 percent of the samples collected during any month are total coliform-positive; or
 - (2) For a public water system with collects fewer than 40 samples per month, more than one sample collected during any month is total coliform-positive; or
 - (3) Any repeat sample is fecal coliform-positive or E. coli-positive; or
 - (4) Any repeat sample following a fecal coliform-positive or E. coli-positive routine sample is total coliform-positive.

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(c) If a public water system is not in compliance with paragraphs (b)(1) through (4), during any month in which it supplies water to the public, the water supplier shall notify the State Board by the end of the business day on which this is determined, unless the determination occurs after the State Board office is closed, in which case the supplier shall notify the State Board within 24 hours of the determination. The water supplier shall also notify the consumers served by the water system. A Tier 2 Public Notice shall be given for violations of paragraphs (b)(1) or (2), pursuant to section 64463.4. A Tier 1 Public Notice shall be given for violations of paragraphs (b)(3) or (4), pursuant to section 64463.1."

DETERMINATIONS

Based upon the above *Statement of Facts and Authorities*, the State Board has determined that the Fountain Trailer Park Water System has violated the following:

1. CCR, Title 22, Section 64426.1(b)(2); Specifically, the Water System violated the total coliform MCL for December 2015, when more than one sample collected in December 2015, tested positive for total coliform bacteria.

The above violation is classified as a non-continuing violation.

DIRECTIVES

Fountain Trailer Park Water System is hereby directed to take the following actions:

- Cease and desist from failing to comply with Section 116555(a) of the California Health and Safety Code (CHSC) and Section 64426.1(b)(2), of Title 22, California Code of Regulations.
- The Water System shall submit an Emergency Chlorination Plan (ECP) to the State Board for review and approval by April 30, 2016. Guidance for preparing an ECP is provided under Attachment B.
- 3. The Water System shall reimburse the State Board, in accordance with an invoice that shall be provided to the Water System, the costs for enforcement activities, and such reimbursement shall be made prior to September 1 (or by a different date if specified by the State Board) of the fiscal year following the

fiscal year in which such costs are incurred as described in CHSC Sections 116577(a)(1-2) and 116577(b).

FURTHER ENFORCEMENT ACTIONS

Section 116270, Chapter 4, Part 12, Division 104 of the CHSC authorizes the State Board to: issue additional citations with assessment of penalties if a public water system continues to fail or correct a violation identified in a citation; take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with orders of the State Board; and petition the superior court to take various enforcement measures against a public water system that has failed to comply with orders of the State Board. The State Board does not waive any further enforcement action by issuance of this citation.

PARTIES BOUND

This citation shall apply to and be binding upon Fountain Trailer Park Water System, its officers, directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The directives of this citation are severable, and Fountain Trailer Park Water System shall comply with each and every provision thereof, notwithstanding the effectiveness of any other provision.

CIVIL PENALTIES

Section 116650, subsections (d) and (e) of the CHSC allow for the assessment of a civil penalty for failure to comply with the requirements of the Safe Drinking Water

Act. Failure to comply with any provision of this Citation may result in the State Board imposing an administrative penalty in an amount not to exceed \$1000 (one thousand dollars) per day as of the date of violation of any provision of this Citation.

March 22/2016

Jaswinder S. Dhaliwal, P.E.

Senior Sanitary Engineer

Drinking Water Field Operations Branch

Certified Mail No. 7015 1520 0000 4433 1747

ATTACHMENTS

Attachment A:

Summary of Bacteriological Samples Collected from January

2015 - January 2016

Attachment B:

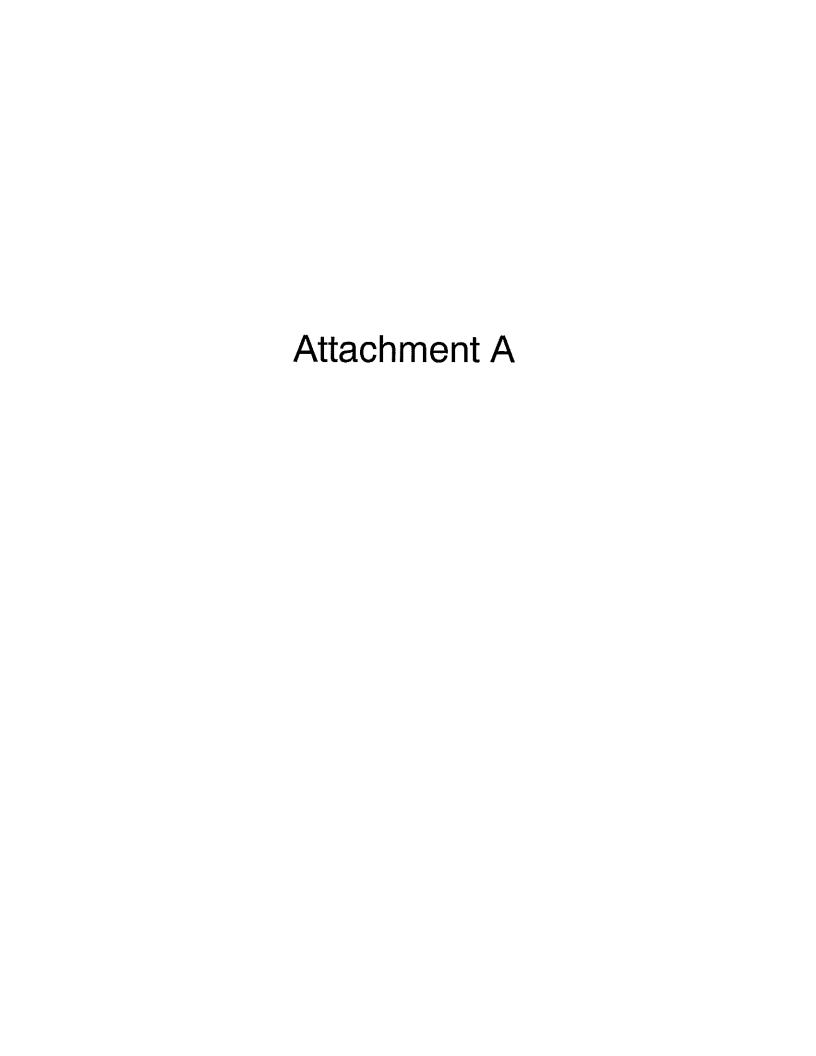
Guidance for Preparing an Emergency Chlorination Plan (ECP)

CC:

Kern County Environmental Health Services Department (w/o attachments)

Dollie Kotsiopoulos, Designated Operator and Sampler (via e-mail)

JSD/dc



Fountain	Trailer	Park	Water
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1500461		Distrib	ution Sy	stem F	req: 1/M			
Sample Date	Time	Location	T Coli	E Coli	F Coll Type	Cl2	Violation	Comment
1/27/2015	13:54	Monthly Bact (Bac	Α	Α	Other		·	
1/27/2015	16:49	Monthly Bact	Α	Α	Routine			
2/11/2015	8:35	Sp #3	Α	Α	Routine			
3/11/2015	9:35	Sp #12	Α	Α	Routine			
4/15/2015	11:50	Sp #24	Α	Α	Routine			
5/12/2015	9:21	Sp #29	Α	Α	Routine			
6/10/2015	8:00	Office	Α	Α	Routine			
7/8/2015	9:30	Sp #3	Α	Α	Routine			
8/24/2015	9:00	Clay Mine Road	Α	Α	Routine			
9/9/2015	7:55	Clay Mine Road	Α	Α	Routine			
10/19/2015	8:27	Clay Mine Road, S	Α	Α	Routine			
11/18/2015	8:11	Clay Mine Road	Α	Α	Routine			
12/16/2015	8:00	Clay Mine Road	Р	Α	Routine			
12/17/2015	1:00	Sample Site #3	Р	Α	Repeat			
12/17/2015	1:10	Space #6	Р	Α	Repeat			
12/17/2015	1:15	Space #12	Р	Α	Repeat		MCL	Citation 03-19-16C-014 issued 3/22/16
1/7/2016	12:23	Space 3, 12, 28, 2	Α	Α	Routine			
1/13/2016	14:02	Space 3, 6, 12, 29,	Α	Α	Other			

Founta	in Tr	ailer 1	ark Water
1500461	от подпости до водобого до техностории техностури	NOTE TO THE SECOND PROPERTY OF THE SECOND PROPERTY OF THE SECOND PROPERTY OF THE SECOND PROPERTY OF THE SECOND	Source Monitoring Freq:
Sample Date	Time	Source	T Coli E Coli F Coli Violation Comment
12/17/2015	1:25	Well	A A
1/13/2016	14:02	Well	A A







State Water Resources Control Board

Division of Drinking Water

Emergency Chlorination Plan Guidance (July 2014) for Public Water Systems

The purpose of this Emergency Chlorination Plan (ECP) is to assist utilities implement emergency chlorination. The guidance provided below is designed to facilitate the installation of emergency chlorination equipment and to assist in the setting of chemical dosage in order to maintain acceptable free chlorine residual needed to insure public health protection immediately after a disaster. Items which should be obtained prior to the onset of a disaster include the following equipment:

- 1. Emergency chlorination units.
- 2. Chlorine residual test kits (preferably DPD)
- 3. Granular Calcium Hypochlorite, 65% available chlorine, (liquid sodium hypochlorite has a relatively short shelf life so it is advisable that it not be purchased in advance). Chemicals used for emergency chlorination must be approved under ANSI/NSF¹ Standard 60 (direct additives).

Installation Procedures

A utility should not wait until an emergency has occurred before it attempts to install its emergency chlorination equipment. It is advisable that all field maintenance staff be familiar with the installation procedures in order to quickly install the emergency chlorination equipment. The remainder of this plan addresses the use of hypochlorinators in the event of an emergency. For those utilities which use gas chlorination units, they should already be familiar with their operation if they are using this type of equipment.

The chlorination equipment purchased by the utility must be adequately sized for the proposed installation. The feed capacity of the hypochlorinator should allow the utility to does at a minimum of 5 parts per million free chlorine residual. After the emergency chlorination units have been physically connected to the wells and/or other sources in question, refer to the attached table or use the following procedures to calculate the appropriate settings. If you are unable to perform these calculations, contact a staff of the Drinking Water Program immediately.

The attached tables may be used to mix a solution of a known strength. Decide on a solution strength that you wish to use and find the amount of chlorine needed for a 100 gallon barrel from Table 1.

Table 2 can be used to determine the volume of solution to be added for different flow rates for each mg/L of chlorine dosage. It should be recognized that large capacity wells will need stronger solution strengths or the feed barrel will need to be filled too frequently. The volumes in table 2 are in gallons per day (gpd). If the feed pump capacity is given in gallons per hour, then the volume from Table 2 must be divided by 24 to give a gph value.

To determine the appropriate pump setting, the value from Table 2 must be divided by the feed pump capacity.

Example:

Feed Pump Capacity = 10 gph; Q = 1500 gpm; 7% solution; 5 mg/L dosage

From table 2 → Chlorine Volume = 30.9 gpd for each mg/L.

For
$$5 \text{ mg/L} \rightarrow 5 \text{ x} (30.9) = 154.5 \text{ gpd}$$

Since feed pump has a maximum capacity of 10 gph, the appropriate length of stroke setting is:

$$\frac{154.5 \times 24}{10 \text{ gph}} = 0.64$$

Outlined below are the equations to use if the Tables are not used:

1. A solution barrel of a known volume must be obtained. The barrel should be filled with a known volume of water. To this volume, a known weight of chemical should be added. The solution strength must be determined using the equation given below:

A 6% solution can be obtained by adding one half pound of chemical per gallon of water using a 100 gallon barrel. (see below):

$$50 / (100 \times 8.34 \text{ lb/gal of water}) \times 100 = 5.99 \text{ or } 6\%$$



used to get percentage

To calculate the pounds per hour of chemical that must be added to obtain a known chlorine concentration, the following equation must be used:

Equation #1:

lbs per hour of chemical = $8.34 \times desired dosage in ppm \times flow rate in gpm \times 60 min/1,000,000$

Assuming the desired dosage is 5 ppm that gives the following equation:

Equation #2: Ibs per hour of chemical = $2.5 \times 10^{-3} \times 10^{-3}$

Next you must determine the required gallons per hour of chemical to be added. This must be obtained using the following equation:

Equation #3:

gallons per hour of chemical = lbs per hour / 8.34 / solution strength / 100 (from above)

Once this value has been obtained, then the next step is to review the maximum feed rate in gallons per day of the chemical feed pump. This is generally printed in a label attached to the pump and it may specify the discharge pressure this maximum rate applies to. Most chemical feed pumps have either a length of stroke setting or two settings for frequency of stroke and length of stroke. To determine what settings should be used, a review of the instrumentation on the pump must be conducted.

If two control settings are provided, then set the frequency control at 100% and provide adjustment only to the length of stroke adjustment. The equation to be used to determine at what setting the length of stroke should be, is given below:

Percent length of stroke = gallons per hour (obtained above) \times 24 \times 100 / the pump capacity in gpd

This numerical setting should be used when adjusting the pump. If both pump settings are to be changed from 100%, then the percent stroke equation is as follows:

Percent length of stroke = gallons per hour x 24×100 / stroke frequency / pump capacity in gpd

A check on the actual dosage can be performed by using the total gallons of solution pumped within a known operating period. That information can be used as follows:

Actual Dosage = <u>gallons of solution x solution strength</u>
gallons of water treated in MG

An easier way to use hypochlorination equipment is to have calibration or volumetric feed cylinders installed on the intake line to the pump. If these cylinders are available, then a known volume of solution can be pumped and the time it takes to pump that volume is used to determine gallons per hour at a known discharge pressure. The actual percent solution must still be known to conduct the other calculations.

Once a utility has implemented emergency chlorination of their system, it is important to conduct follow up distribution chlorine residual monitoring to determine the effectiveness of the chlorination process. In the event of an emergency, hypochlorination equipment should be used to dose the system at 2 ppm of free chlorine residual. Chlorine residual monitoring within the distribution system should take place to verify that an adequate residual is being obtained at all locations within the distribution system. Any areas which have suppressed chlorine residuals should receive further investigation to determine whether or not there are other problems associated with the reduced residuals.

Flushing should be provided if possible, to draw the chlorinated water into the distribution system as soon as possible.

In addition to the chlorine residual monitoring, bacteriological sampling of the distribution system in all areas should be conducted. Chlorine residual monitoring in addition to bacteriological sampling should be used to further define areas of distribution system that need additional investigation. Chlorination of the system should continue until it has been verified that no structural problems exist within the distribution system and all bacteriological monitoring shows that there is no presence of pathogenic organisms.

TABLE 1

AMOUNT OF CHLORINE PER 100 GALLON BARREL*

	1.1.0	.00	, , ,							, ,		
	Strength 3%	%	%	2%	%9	7%	%8	%6	10%	11%	12%	13%
Type of Chlorine												
5% Sodium Hypochlorite**		60 gal	80 gal	100 gal								
12.5% Sodium Hypochlorite**		24 gal	32 gal	40 gal	48 gal	56 gal	64 gal	72 gal	80 gal	88 gal	96 gal	
65% Calcium Hypochlorite***		38 lbs 51 lbs	51 lbs	64 lbs	77 lbs	90 lbs	103 lbs	116 lbs	128 lbs	103 lbs 116 lbs 128 lbs 141 lbs	167 lbs	

 st Add the quantity indicated to the 100 gallon barrel and then fill the remaining volume with water.

** The sodium hypochlorite must be ANSI/NSF1 certified for potable drinking water and approved as direct additive (ANSI/NSF Standard 60).

1: American National Standard Institute (ANSI) or National Sanitation Foundation (NSF)

*** HTH, tablets or granular chlorine

For 10% solution using 12.5% sodium hypochlorite, use 80 gallons of sodium hypochlorite and add 20 gallons Example:

of water.

For 10% solution using 65% available Calcium Hypochlorite [Ca(OCI)₂], use 128 lbs of granular chlorine and Example:

add water to fill barrel and mix.

CHLORINE VOLUME REQUIRED GALLONS PER DAY (GPD) PER MG/L OR PPM OF DESIRED CHLORINE DOSAGE* **TABLE 2**

11% 12% 13%		0.7 0.6 0.6	1.0 0.9 0.8	1.3 1.2 1.1	3.9 3.6 3.3	6.6 6.0 5.5	10.5 9.6 8.9	13.1 12.0 11.1	19.6 18.0 16.6	26.2 24.0 22.2
9% 10%		0.8 0.7	1.2 1.0	1.6 1.4	4.8 4.3	8.0 7.2	12.8 11.5	16.0 14.4	24.0 21.6	32.0 28.8
%8		6.0	1.4	1.8	5.4	9.0	14.4	18.0	27.0	36.0
2%		1.03	1.5	2.0	6.2	10.3	16.5	20.6	30.9	41.1
%9		1.2	1.8	2.4	7.2	12.0	19.2	24.0	36.0	48.0
2%		1.4	2.0	2.9	8.6	14.4	23.0	28.0	21.5	57.6
4%		1.8	2.7	3.6	10.8	18.0	28.8	36.0	54.0	72.0
% —		2.4	3.6	4.8	14.4	24.0	38.4	48.0	72.0	96.0
Solution Strength										
	Flow Rate	50 gpm	75 gpm	100 gpm	300 gpm	500 gpm	800 gpm	1000 gpm	1500 gpm	2000 gpm

^{*} Values in the Table are the flow rates in gallons of solution per day that be added for each mg/L of desired dosage.

Example: Well Discharge = 1,000 gpm

Solution Strength = 5%

Desired Dosage = 5 mg/L or 5 ppm

From Table 2, Need to add 28.8 gpd per mg/L (or ppm)

Therefore, 5 mg/L \times 28.8 gpd/(mg/L) = 144 gpd.